

**PLAINTIFF'S CERTIFICATION OF SECURITIES  
FRAUD CLASS ACTION COMPLAINT**

I/We, George Eliopoulos, hereby certify that the following is true and correct to the best of my/our knowledge, information and belief:

1. I/We have reviewed the complaint filed against *Biopure Corporation* (the "Complaint"), and have authorized the filing of a complaint on my/our behalf. I/We retain Berman, DeValerio Pease Tabacco Burt & Pucillo to represent me/us in this action.

2. I/We am/are willing to serve as a representative party on behalf of the class (the "Class") as defined in the Complaint, including providing testimony at deposition and trial, if necessary.

3. My/Our transaction(s) in Biopure Corporation common stock during the Class Period are as follows:

| <u>Trade Date</u> | <u>Number of Shares Purchased</u> | <u>Price Per Share</u>       |
|-------------------|-----------------------------------|------------------------------|
| 9/19/03           | 2,000                             | 7.50 (net amount: 15,412)    |
| 6/05/03           | 2,500                             | 6.19 (net amount: 15,499.95) |
| 6/09/03           | 1,500                             | 6.45 (net amount: 9,702.95)  |
| 8/04/03           | 975                               | 7.48 (net amount: 7,317.95)  |
| 8/08/03           | 1,200                             | 7.16 (net amount: 8,624.95)  |
| 8/22/03           | 1,500                             | 7.50 (net amount: 11,274.95) |

| <u>Trade Date</u> | <u>Number of Shares Sold</u> | <u>Price Per Share</u>      |
|-------------------|------------------------------|-----------------------------|
| 10/31/03          | 2,000                        | 3.48 (net amount: 6,874)    |
| 10/30/03          | 2,500                        | 3.84 (net amount: 9,593.79) |
| 10/30/03          | 1,500                        | 3.84 (net amount: 5,756.87) |
| 10/30/03          | 975                          | 3.84 (net amount: 3,741.98) |
| 10/30/03          | 1,200                        | 3.84 (net amount: 4,605.92) |

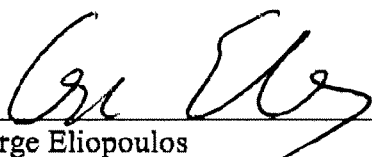
|          |       |  |
|----------|-------|--|
| 10/30/03 | 1,500 | 3.84 (net amount: 5,756. <sup>26</sup> ) |
|          |       |  |

4. I/We did not purchase these securities at the direction of my/our counsel, or in order to participate in any private action arising under the Securities Exchange Act of 1934.

5. During the three year period preceding the date of my/our signing this Certification, I/we have not sought to serve, nor have I/we served, as a representative to any party on behalf of a class in any private action arising under the Securities Exchange Act of 1934.

6. I/We will not accept any payment for serving as a representative party on behalf of the Class beyond my/our pro rata share of any possible recovery, except for an award, as ordered or approved by the court, for reasonable costs and expenses (including lost wages) directly relating to my/our representation of the Class.

Signed under the penalties of perjury this 27 day of February 2004

  
George Eliopoulos

CERTIFICATION OF PLAINTIFF  
PURSUANT TO FEDERAL SECURITIES LAWS

I, MARK MENTZ ("Plaintiff") declare as to the claims asserted under the federal securities laws, that:

1. I have reviewed the class action complaint asserting securities claims against Biopure Corporation and wish to join as a plaintiff, retaining Cohen, Milstein, Hausfeld & Toll, P.L.L.C. as my counsel.

2. Plaintiff did not purchase the security that is the subject of this action at the direction of plaintiff's counsel or in order to participate in this private action.

3. Plaintiff is willing to serve as a representative party on behalf of the class, including providing testimony at deposition and trial, if necessary.

4. My transactions in Biopure Corporation during the Class Period (March 5, 2003 through December 24, 2003) are listed below:

| <u># of shares</u> | <u>Transaction (buy/sell)</u> | <u>Date</u> | <u>Price Per Share</u> |
|--------------------|-------------------------------|-------------|------------------------|
| 1,000              | BUY                           | 8/12/03     | 7.00                   |
| 1,000              | SELL                          | 9/3/03      | 7.94                   |
| 1,000              | SELL                          | 9/3/03      | 7.92                   |
| 1,000              | BUY                           | 9/23/03     | 6.94                   |
| 1,000              | BUY                           | 9/25/03     | 6.42                   |
| 1,000              | BUY                           | 9/29/03     | 5.50                   |
| 500                | BUY                           | 10/8/03     | 6.10                   |
| 1,200              | BUY                           | 10/20/03    | 6.08                   |
| 1,000              | SELL                          | 10/20/03    | 6.59                   |
| 1,000              | BUY                           | 10/23/03    | 5.72                   |
| 2,000              | SELL                          | 10/30/03    | 3.84                   |
| 500                | BUY                           | 12/16/03    | 2.55                   |

5. During the three years prior to the date of this Certificate, Plaintiff has not sought to serve or served as a representative party for a class in the following actions under the federal securities laws except as follows:

6. Plaintiff will not accept any payment for serving as a representative party on behalf of the class beyond plaintiff's pro rata share of any recovery, except such reasonable costs and expenses (including lost wages) directly relating to the representation of the class as ordered or approved by the court.

I declare under penalty of perjury that the foregoing true and correct.

Executed this 22 day of January, 2004.

Signed:



Name:

MARK MENTZ

Address:

20 ROBIN LAKE DRIVE  
CHERRY HILL, NJ 08003

Telephone:

856-427-0930

County of Residence:

CAMDEN

MARK MINTZ

Name

20 ROSEN LAKE DRIVE

Address

C HERRY HILL, NJ 08003

CAMPDEN

County

856 427 0930

Phone

MATIAN7@COMCAST.NET

E-Mail address

CERTIFICATION OF PLAINTIFF  
PURSUANT TO FEDERAL SECURITIES LAWS

I, Dale Self, ("Plaintiff") declare as to the claims asserted under the federal securities laws, that:

1. I have reviewed the class action complaint asserting securities claims against Biopure Corporation and wish to join as a plaintiff, retaining Cohen, Milstein, Hausfeld & Toll, P.L.L.C. as my counsel.
2. Plaintiff did not purchase the security that is the subject of this action at the direction of plaintiff's counsel or in order to participate in this private action.
3. Plaintiff is willing to serve as a representative party on behalf of the class, including providing testimony at deposition and trial, if necessary.
4. My transactions in Biopure Corporation during the Class Period (March 5, 2003 through December 24, 2003) are listed below:

| # of shares          | Transaction (buy/sell) | Date                | Price Per Share |
|----------------------|------------------------|---------------------|-----------------|
| ✓ 1380               | Buy                    | 10-31-03            | 3.55            |
| 5320 <del>5320</del> | Buy                    | 10-31-03            | 3.60            |
| 3300 <del>3300</del> | Buy                    | 10-31-03            | 3.59            |
| <del>1100</del>      | <del>Buy</del>         | <del>11-11-03</del> | <del>3.55</del> |
| <del>1100</del>      | <del>Buy</del>         | <del>11-11-03</del> | <del>3.55</del> |
| 10,000               | Sold                   | 1-16-04             | 2.04            |
|                      |                        |                     |                 |
|                      |                        |                     |                 |

5. During the three years prior to the date of this Certificate, Plaintiff has not sought to serve or served as a representative party for a class in the following actions under the federal securities laws except as follows:

6. Plaintiff will not accept any payment for serving as a representative party on behalf of the class beyond plaintiff's pro rata share of any recovery, except such reasonable costs and expenses (including lost wages) directly relating to the representation of the class as ordered or approved by the court.

I declare under penalty of perjury that the foregoing true and correct.

Executed this 22<sup>nd</sup> day of January, 2004.

Signed: \_\_\_\_\_

Dale Self

Name: \_\_\_\_\_

Dale Self

Address: \_\_\_\_\_

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County of Residence: \_\_\_\_\_

Hillsborough.

Dak Self

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